This application has been reviewed in light of the Office Action dated April 28, 2009. Claims 12-21 and 23-29 are presented for examination, of which Claims 12, 20 and 21 are in independent form. Claims 12-14, 16, 19-21, 23, 24 and 29 have been amended to define still more clearly what Applicant regards as his invention. Claims 22 and 30-34 have been cancelled without prejudice or disclaimer of subject matter, and will not be mentioned further. Favorable reconsideration is respectfully requested.

In the outstanding Office Action, Claim 21 was rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Without conceding the correctness of this rejection, Applicant has amended Claim 21 to be directed to a computer-readable storage medium, storing the program in executable form. It is believed that this obviates the rejection under Section 101, withdrawal of which is therefore respectfully requested.

In addition, Claims 12-21 and 23-29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication 2002/0156947 (Nishio) in view of U.S. Patent 5,903,716 (Kimber).

Independent Claim 12 is directed to a network device management apparatus which manages a network device which is connected to a network, where the network device has a plurality of functions and *does not support any network compatible Plug and Play function*. The claimed apparatus of Claim 12 comprises recognition means, for recognizing a network device that does not support the network compatible Plug and Play function. Also provided are generating means, which, if the recognition means recognizes a network device that does not support the network compatible Plug and Play function, generate a plurality of device IDs corresponding to a plurality of functions of the

network device that has been recognized by the recognition means. Each of these device IDs includes at least information identifying the model, information indicating the manufacturer and information indicating one of the plurality of functions of the recognized network device, so that, in accordance with network compatible supporting Plug and Play function, a client apparatus on the network can install a plurality of device drivers for controlling the plurality of functions of the network device recognized by said recognition means. In addition, the claimed apparatus comprises response means for responding to the client apparatus using the plurality of device IDs generated by the generating means.

Nishio relates to generating a device ID in a legacy format by receiving a packet in a UPnP format and extracting the model and manufacturer name.

Kimber relates to a system that includes a virtual printer having a plurality of communication protocols which correspond to a plurality of configurations.

It should be noted that, generally, when a PC detects a device having Plug and Play function, the PC installs one device driver of the detected device.

It should also be noted that the network device to be managed by an apparatus according to Claim 12 is a network device which *does not support any network compatible Plug and Play function* and *which has a plurality of functions*. Among other notable features of an apparatus according to Claim 12 is that the apparatus generates a *plurality* of device IDs, corresponding to the plurality of functions of the network device, and that each of these device IDs includes at least information identifying the model, information indicating the manufacturer and information indicating one of the plurality of functions of the recognized network device, and the apparatus responds to a client apparatus on the network using the plurality of device IDs generated in this fashion. This makes it possible for the client apparatus to install a *plurality* of device drivers, to control

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the *plurality* of functions of the network device recognized by the recognition means in accordance with network compatible supporting Plug and Play function, even though the network device does not itself support any network PnP function.

For example, if the recognition means recognizes a network device that does not support any network compatible Plug and Play function and which has two functions F(A) and F(B), according to Claim 12, then the generating means generates two device IDs, one for each of the functions F(A) and F(B), and the response means responds to a client using the two device IDs. As a result the client can install two device drivers, for controlling the two functions, in accordance with network compatible supporting Plug and Play function, *even if the network device does not support* any network compatible Plug and Play function.

The cited references fail to teach or suggest these features of Claim 12, in particular, the recited generating means and response means. Accordingly, it is believed clear that Claim 12 is allowable over *Nishio* and *Kimber*, taken separately or in combination.

The other independent claims herein are a method claim and a computer-readable storage medium claim corresponding to apparatus Claim 12, and are both believed to be allowable for the reasons stated above with regard to Claim 12.

A review of the other art of record has filed to reveal anything which, in Applicant's opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the

same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and allowance of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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